

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DANA DUGGAN,

Plaintiffs,

v.

Civil Action No. 18-12277-JGD

BIG PICTURE LOANS, LLC, MATT
MARTORELLO, ASCENSION
TECHONOLOGIES, LLC F/K/A
BELLICOSE CAPITAL, LLC,

Defendants.

ASSENTED-TO MOTION TO CONTINUE HEARING ON DISCOVERY MOTIONS

Defendants, Big Picture Loans, LLC and Ascension Technologies, LLC (“Defendants”), respectfully move the Court for a continuance of the hearing on *Defendants’ Motion for Protective Order* (Dkt. 45) and *Plaintiff’s Motion for Discovery* (Dkt. 47), which is currently scheduled for April 17, 2019 at 2:30 p.m., to the morning of May 14, 2019, anytime on May 29, 2019 or May 30, 2019,¹ or a date thereafter that is convenient for the Court.

As reason therefore, Defendants state that undersigned counsel has a scheduling conflict on April 17, 2019, in that he is due in Plymouth Superior Court at 2:00 p.m. for a final pretrial conference that has been scheduled since January 2019. The Superior Court requires lead trial counsel to attend the final pretrial conference. Plaintiff’s counsel and co-defendant Matt Martorello’s counsel have assented to this motion.

¹ Based on a recent conversation the undersigned had with the Court’s Secretary, Defendants understand that the only May dates the Court potentially had available for the hearing was May 14, 2019, May 29, 2019 and May 30, 2019.

Respectfully submitted,

Defendant,
BIG PICTURE LOANS, LLC and
ASCENSION TECHNOLOGIES, LLC,
By its attorney,

/s/ Michael T. Grant

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I, certify that, pursuant to Local Rule 7.1(a)(2), counsel for Big Picture Loans, LLC and Ascension Technologies, LLC conferred with counsel for the other parties, and counsel for the other parties assent to the relief requested herein.

/s/ Michael T. Grant

Michael T. Grant

CERTIFICATE OF SERVICE

I, Michael T. Grant, hereby certify that this document filed through the ECF System will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on April 12, 2019.

/s/ Michael T. Grant
Michael T. Grant